

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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IN RE: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL No. 1456
LITIGATION)	Civil Action No. 01-CV-12257-PBS
)	
)	
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)	
THIS DOCUMENT RELATES TO:)	Hon. Patti B. Saris
International Union of Operating Engineers,)	
Local No. 68 Welfare Fund v. AstraZeneca PLC)	
et al. Civil Action No. 04-11503-PBS)	
)	
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**DECLARATION OF LUCY FOWLER IN SUPPORT OF ASTRAZENECA'S
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT
DR. STANLEY C. HOPKINS' MOTION TO QUASH**

I, Lucy Fowler, hereby declare that:

1. I am an associate at Foley Hoag LLP, which serves as counsel to defendant AstraZeneca Pharmaceuticals LP in the above-captioned litigation.

2. This declaration is submitted in support of AstraZeneca's Memorandum of Law in Opposition to Defendant Dr. Stanley C. Hopkins' Motion to Quash.

3. Attached as Exhibit 1 is a true and correct copy of Defendant AstraZeneca's First Request for Production of Documents to Defendant Dr. Stanley C. Hopkins, dated September 16, 2005.

4. Attached as Exhibit 2 is a true and correct copy of Subpoena ad Testificandum and Duces Tecum issued to Jack E. Fernandez, Esq., dated September 16, 2005.

5. Attached as Exhibit 3 is a true and correct copy of Joinder of Defendant Stanley C. Hopkins, M.D., in Plaintiff's Motion for Remand, or, in the Alternative, Motion to Remand Pursuant to 28 U.S.C. § 1448, dated August 4, 2003.

By: /s/ Lucy Fowler

DATED: October 11, 2005

Boston, MA

Lucy Fowler (BBO# 647929)

FOLEY HOAG LLP

155 Seaport Boulevard

Boston, MA 02110

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on October 11, 2005, a copy to Verilaw Technologies for posting and notification to all parties.

/s/ Lucy Fowler

Lucy Fowler